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To Jack Boller/R10/USEPA/US@EPA, Sylvia
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Subject Hanford groundwater monitoring - mixed waste trenches and
the submarine reactor trenches

Jack/Sylvia: Last week, Ecology shared a new version of a groundwater monitoring plan that the permittees/permit applicants intend to apply to Hanfords "low-level burial grounds." Previously, the only groundwater plan that I've been able to locate is an interim-status groundwater monitoring plan dated 2004, which I'll provide to you separately in preparation for next week's inspection. As we've discussed informally, I'm sure both Ecology and facility folks will note this document as part of inspection activities - at least everyone on the EPA side can at least acknowledge its existence.

The basis for Ecology sharing this revised GW monitoring plan, ostensibly a final status plan, is to solicit informal feedback/program support comments early in Ecology's review of the plan through the permitting process. While I consider the plan permit application material that Ecology will use in drafting of the re-issue Hanford permit, the document reflects several very significant regulatory and technical flaws that have plagued GW monitoring of the mixed waste and sub trenches. I've prepared a fairly detailed draft writeup that looks at these issues, and that I'll share w/Ecology as my response. I don't see much point in doing any additional review of the draft GW monitoring plan until these issues are resolved. Although this draft plan at least attempts to represent itself as a final status (versus the historical insistence on applicability of interim status standards), I'm not sure this plan gets anyone much closer to defensible permit conditions.

Jan: I'm including you in this e-mail to keep you in the loop on what I'm looking at and how I'm responding. Comments/thoughts more than welcome.



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